

Randall B. Bateman (USB 6482)  
BATEMAN IP  
299 South Main Street, Suite1300  
Salt Lake City, UT 84111  
Tel: (801) 533-0320  
Email: rbb@batemanip.com; mail@batemanip.com

*Attorneys for Plaintiffs The Wizard Trades, LLC and Michael Hubbs*

---

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

---

THE WIZARD TRADES, LLC, a Utah  
Limited Liability Company, and MICHAEL  
HUBBS, an individual,

Plaintiff,  
vs.

CHARLTON LACHASE, an individual,  
ANDRA RUSH, an individual, STEVEN  
DUHON, an individual, and BRIAN  
HERTNEKY, and individual,  
.  
Defendants.

**DECLARATION OF MICHAEL HUBBS  
RE LACHASE MOTION TO DISMISS**

Case No. 2:23-cv-00207-DAO

District Judge David Barlow

Magistrate Judge Daphne A. Oberg

I, Michael Hubbs, hereby declare:

1. I am over the age of 18 and am competent to make this declaration. I am one of the Plaintiffs in the above-referenced matter and am the owner of The Wizard Trades, LLC, the other Plaintiff.

2. Much of my Facebook page is dedicated to my work instructing people about online trading.

3. Defendant Charlton Lachase (“Lachase”) has known since at least February of 2022 that I reside in Utah. Attached hereto as Attachment 1 is a copy of a text conversation

between Lachase and me regarding my purchase of a car in Florida. In the conversation, Lachase specifically asked me if I was going to drive the car back to my home in Utah.

4. In July of 2022 Defendant Charlton Lachase reached out to me in Utah to purchase access to TWT's online trading training program.

5. In July 2022 Lachase also reached out to me and asked me to conduct a class for him and others in Florida. A copy of our communications is attached hereto as Attachment 2.

6. We discussed my flying from Salt Lake City to Florida and Mr. Lachase paid for my airfare so I would do the class.

7. Mr. Lachase picked me up from the airport and drove me to the location of the meeting. During the drive Mr. Lachase asked me numerous questions about living in Utah and even indicated that he might want to move to Utah.

8. A few days later Mr. Lachase asked me to host a 5-day seminar in Utah to further teach Lachase and his associates more about online trading. A copy of Lachase's September 29, 2022 communication is attached hereto as Attachment 3.

9. Lachase bragged about how well he was doing with my program on social media and shared numerous of my posts on his Facebook page. A copy of some of Mr. Lachase's posts on Facebook are attached hereto as Attachment 4.

10. In early 2023, Mr. Lachase claimed to have suffered a major stock market loss and contacted me in Utah, demanding a refund for his payment to TWT.

11. When I reminded Mr. Lachase that there was no refunds, Mr. Lachase threatened to provide copies of TWT's materials to the public without payment in violation of the terms of service and my copyrights.

12. Mr. Lachase made copies of the training materials and sent them to others to place on YouTube.

13. Lachase also started publishing statements on social media accusing TWT's program of being fraudulent, and accusing me of being a con artist and a scam. Copies of representative statements Mr. Lachase posted to Facebook are attached hereto as Attachment 5.

14. Mr. Lachase's allegations that TWT and I have engaged in fraudulent conduct or a scam continued even after he was sent a cease-and-desist letter asking him to stop. These comments have damaged my reputation and caused me considerable economic harm.

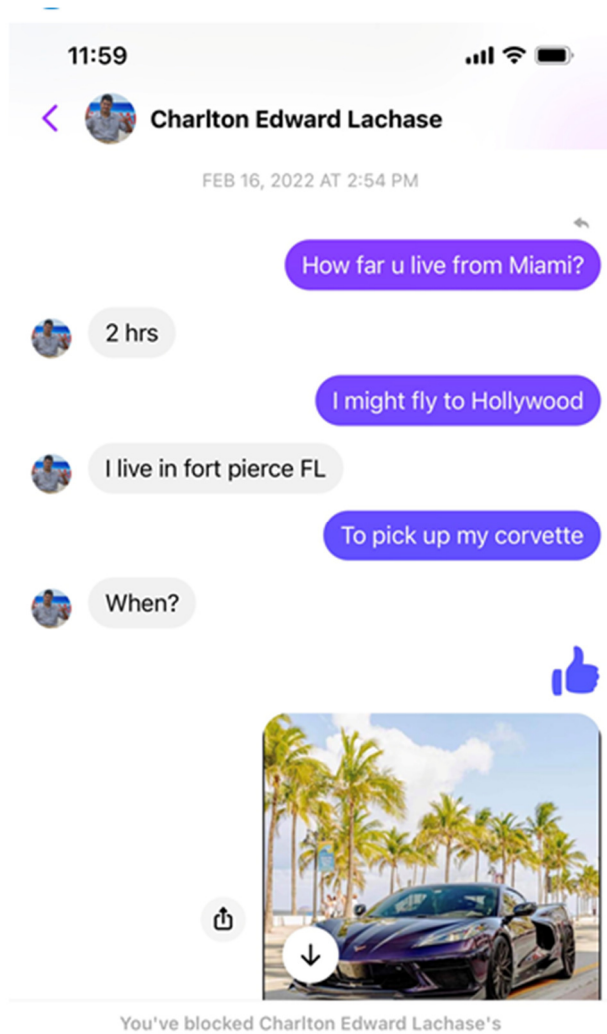
I hereby declarant under the laws of the United States and the laws of the State of Utah that the foregoing to correct to the best of my knowledge and belief.

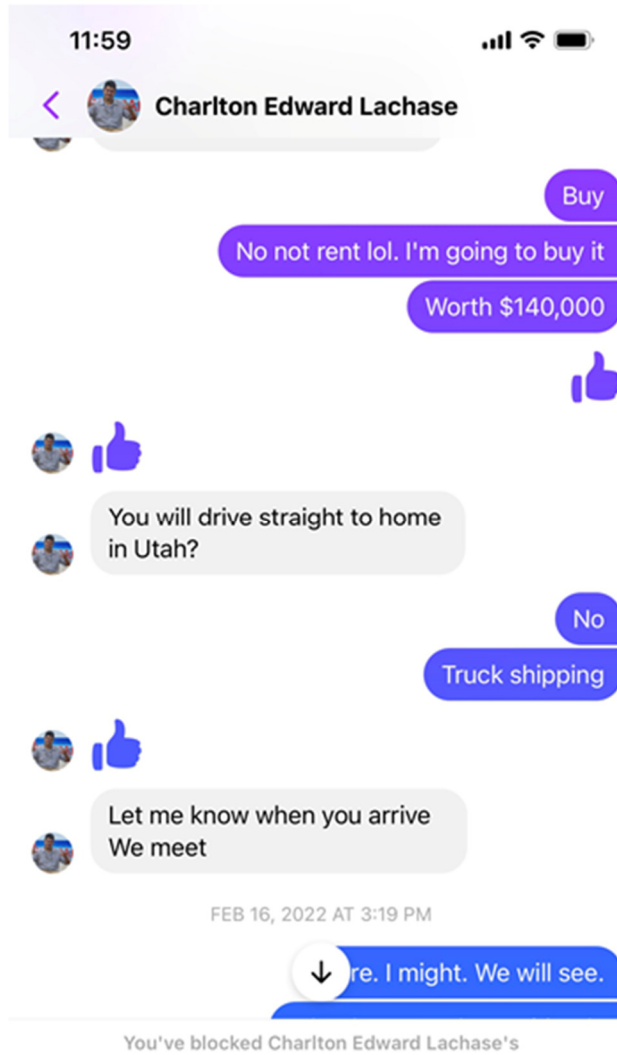
Dated this 11th day of September 2023.

A handwritten signature in black ink, appearing to read 'Michael Hubbs', written over a horizontal line.

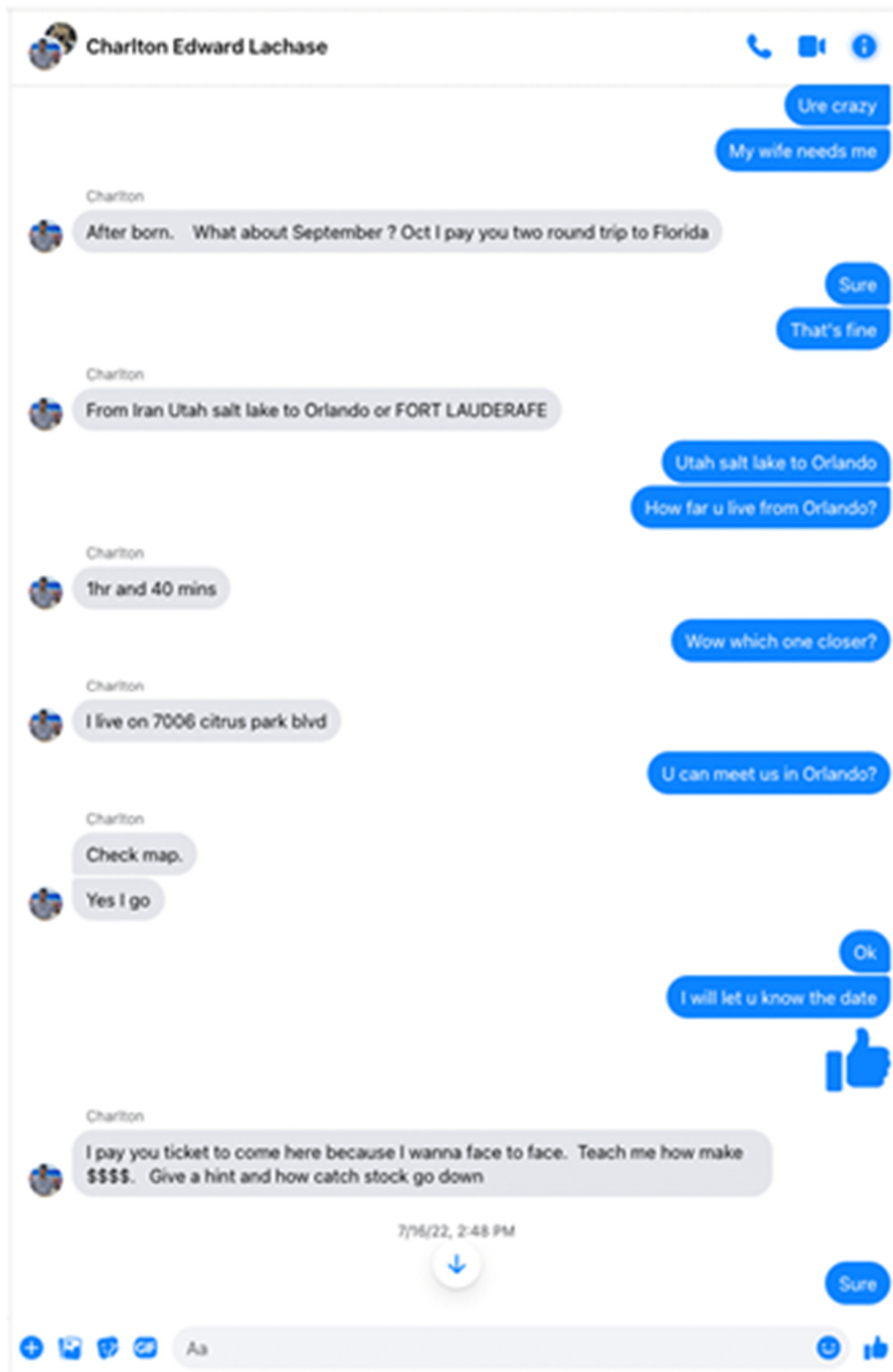
Michael Hubbs

## **ATTACHMENT 1**



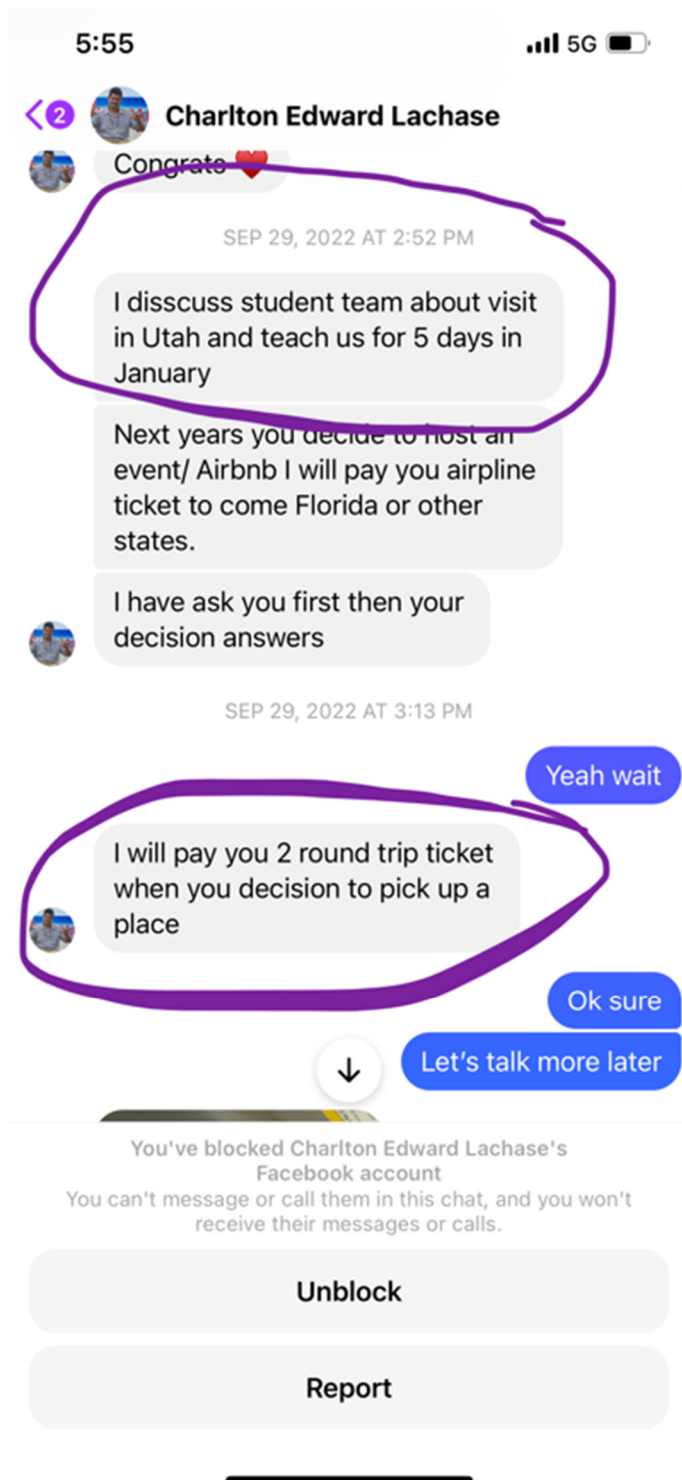


## **ATTACHMENT 2**



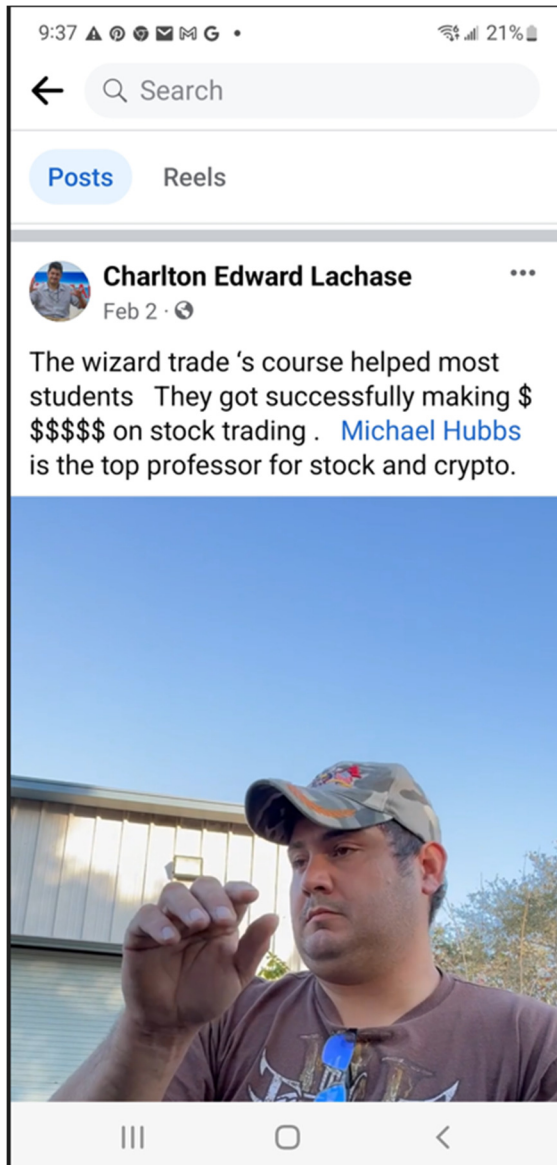


## **ATTACHMENT 3**



## **ATTACHMENT 4**





## **ATTACHMENT 5**





**Charlton Edward Lachase**

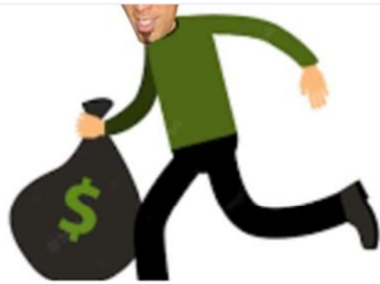


Apr 7 · 🌐



**Cesar Tulum Muñoz** · [Follow](#)

Apr 7 · 🌐



Michael Hubbs a scam The wizard trades.

[https://consumer.ftc.gov/articles/real-estate-investment-scams?fbclid=IwAR2kN7VR88UOdGDfol51\\_yVEyv2n8Wbt1AkarW7wOk3FcQwX6HvuUZA3Gg](https://consumer.ftc.gov/articles/real-estate-investment-scams?fbclid=IwAR2kN7VR88UOdGDfol51_yVEyv2n8Wbt1AkarW7wOk3FcQwX6HvuUZA3Gg)



